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**KHALIL ABDUL-MALIK,**

UNITED STATES DISTRICT COURT  
DISTRICT COURT OF NEW JERSEY  
NEWARK

Plaintiff

vs.

Civil Action No.: ( - )

**THE TRUSTEES OF THE NEWARK**  
ACADEMY, a New Jersey Not-for-Profit  
Corporation; and **JOHN DOES 1-5** (fictitious  
individuals),

**COMPLAINT**

Defendants.

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**JURISDICTION**

1. This action is brought pursuant to the Americans With Disabilities Act.

Jurisdiction is conferred under 28 U.S.C. Section 1331 and Section 1343(3). This Court has supplemental jurisdiction over Plaintiff's pendent state law claims pursuant to 28 U.S.C. Section 1367.

**PARTIES**

2. Plaintiff Khalil Abdul-Malik, residing at 3003 Van Ness Street, Apt. W127, Washington DC NW, 22008, and was, at all times herein relevant, a resident of the State of New Jersey.

3. Defendants The Trustee of the Newark Academy, a New Jersey Not-for-Profit Corporation and/or John Does 1-5 were at all times mentioned herein agents of the Defendants.

4. All Defendants are named in their individual and official capacities.

**FACTUAL ALLEGATIONS COMMON TO ALL COUNTS**

1. In or about August 2016, the Plaintiff was hired as a teacher by the Defendants.

2. In or about July 2017, the Plaintiff was injured and sustained interallia hernia limiting his physical activity, physical motion and ability to work.

3. On or about January 13, 2017, his spouse suffered severe emotional harm leaving the Plaintiff with psychological damage and consequential limitations.

4. From January 4, 2018 to March 2018, the Plaintiff sought from the Defendant reasonable accommodations to permit him to survive and prosper as a teacher.

**COUNT ONE**  
**VIOLATION OF THE AMERICANS WITH DISABILITIES ACT**

1. The previous paragraphs are incorporated herein inclusively as if fully set forth.

2. Defendants violated Plaintiff's rights pursuant to the Americans with Disabilities Act by failing to provide reasonable accommodations for his injuries, medical treatment and surgical recovery.

4. As a direct and proximate cause of conduct of Defendants set forth above, Plaintiff sustained injuries including but not limited to multiple hernias, emotional distress, and will incur additional special damages in the future in an amount which cannot yet be determined.

**WHEREFORE**, Plaintiff demands judgment against Defendants

-10 on this Count together with compensatory and punitive damages, attorney's fees, interest and

costs of suit incurred, and for any such further relief as the court deems proper and just.

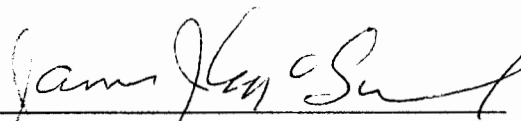
**DEMAND FOR TRIAL BY JURY**

Plaintiff hereby demands a trial by jury as to all issues.

**DESIGNATION OF TRIAL COUNSEL**

Please be advised that James J. McGuire, Jr., Esquire is hereby designated trial counsel in the above captioned matter.

Dated: October 22, 2019

  
**JAMES J. McGUIRE, JR., ESQUIRE**